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Attorneys for Defendant Scott M. Colabella, in his official capacity as Ocean County Clerk

CHRISTINE CONFORTI, Plaintiff vs. CHRISTINE GIORDANO HANLON, in her official capacity as Monmouth County Clerk, SCOTT M. COLABELLA, in his official capacity as Ocean County Clerk, and PAULA SOLLAMI COVELLO, in her official capacity as Mercer County Clerk, Defendants.	UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY Civil Action No.: 3:20-cv-08267- FLW-TJB <u>Civil Action</u> APPLICATION FOR EXTENSION OF TIME TO ANSWER, MOVE, OR OTHERWISE REPLY PURSUANT TO L. CIV. R. 6.1(b)
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APPLICATION is hereby made for a Clerk's Order extending the time within which Defendant Scott M. Colabella in his official capacity as Ocean County Clerk ("Colabella") may Answer, move, or otherwise reply to the Complaint and Jury Demand filed by Plaintiff, Christine Conforti. In support of this Application for an Extension of Time, Christopher A. Khatami, Esq., makes the following representations:

- 1) No previous extension of time has been obtained.
- 2) Plaintiff's Complaint was filed on July 6, 2020;
- 3) On August 17, 2020, Plaintiff requested that Colabella waive service which counsel agreed to do pursuant to F.R.C.P. 4(d);

4) Defendant's time to answer, move, or otherwise reply expires on October 16, 2020 pursuant to F.R.C.P. 12(a)(1)((A)(ii); and

5) This application is made prior to the expiration of the period sought to be extended.

It is respectfully requested that the time within which Defendant may answer, move, or otherwise reply to Plaintiff's Complaint be extended by a period of fourteen (14) days to October 30, 2020.

RESPECTFULLY SUBMITTED,

BERRY SAHRADNIK KOTZAS & BENSON

DATED: October 15, 2020

By: /s/ Christopher A. Khatami
CHRISTOPHER A. KHATAMI, ESQ. (043472013)